

**No. 1:17-CV-130**



expected. Based on recent discussions with the Criminal AUSA, the United States now believes that the criminal matter should be resolved on or before November 6, 2018.

If the Court lifts the stay, the immediate civil forfeiture case potentially burdens the United States' ability to finally resolve the criminal matter. Based on progress of discussions in the criminal case, the United States anticipates resolving the issues underlying the civil forfeiture by a pre-indictment disposition. For this reason, the United States respectfully requests that this Honorable Court extend the stay up to and including November 6, 2018.

Respectfully submitted,

JOSEPH D. BROWN  
UNITED STATES ATTORNEY

/s/ Robert Austin Wells  
ROBERT AUSTIN WELLS  
Assistant United States Attorney  
Texas State Bar No. 24033327  
110 N. College, Suite 700  
Tyler, Texas 75702  
Tel: (903) 590-1400  
Fax: (903) 590-1437  
Email: robert.wells3@usdoj.gov

James G. Gillingham  
Assistant United States Attorney  
Texas State Bar No. 24065295  
110 N. College, Suite 700  
Tyler, Texas 75702  
Tel: (903) 590-1400  
Fax: (903) 590-1437  
Email: James.Gillingham@usdoj.gov

ATTORNEYS FOR THE UNITED STATES

**CERTIFICATE OF SERVICE**

I hereby certify on this 4th day of September, 2018, a true and correct copy of this document was served electronically by the Court's CM/ECF system to all counsel of record.

/s/     *Robert Austin Wells*  
ROBERT AUSTIN WELLS  
Assistant United States Attorney